

EXHIBIT 13

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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
-----x
MOSHE SAPERSTEIN, et al.,
Plaintiffs,
vs.
THE PALESTINIAN AUTHORITY and THE
PALESTINAIN LIBERATION ORGANIZATION,
Defendants.

-----x

** CONFIDENTIAL **

VIDEOTAPED DEPOSITION of AHMED QUREI,
taken before Cheryll Kerr, LSR, a Shorthand
Reporter, Notary Public, and Commissioner,
held at the Ambassador Hotel, East Jerusalem,
Israel, on Thursday, the 17th day of June,
2010 at 10:29 a.m.

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<p>1 Confidential - A. Qurei</p> <p>2 Q. And, sir, is it fair to say that you were</p> <p>3 chosen for that position because of your 13-year</p> <p>4 experience in the banking world?</p> <p>5 (Thereupon, the interpreter begins to</p> <p>6 translate the record into Arabic for the</p> <p>7 witness.)</p> <p>8 MR. ROCHON: Objection, calls for</p> <p>9 speculation.</p> <p>10 MR. STEINER: If you know.</p> <p>11 (Thereupon, the interpreter then</p> <p>12 continues to translate the record into</p> <p>13 Arabic for the witness.)</p> <p>14 THE WITNESS: It was a selection.</p> <p>15 BY MR. STEINER:</p> <p>16 Q. And was it --</p> <p>17 Did you have a good understanding of banking at</p> <p>18 that time, when you were chosen for that position?</p> <p>19 MR. ROCHON: Objection, vague.</p> <p>20 (Thereupon, the interpreter then</p> <p>21 begins to translate the record into Arabic</p> <p>22 for the witness.)</p> <p>23 BY MR. STEINER:</p> <p>24 Q. By "bank," I mean general knowledge of</p> <p>25 banking that you would expect --</p>	<p>1 Confidential - A. Qurei</p> <p>2 during that period of time?</p> <p>3 A. There was a board of directors from</p> <p>4 officials in the -- in the organization, and some of</p> <p>5 them were from the private sector.</p> <p>6 Q. Whose name from that board of directors</p> <p>7 do you remember as you sit here today?</p> <p>8 A. I don't remember.</p> <p>9 Q. What were your duties and</p> <p>10 responsibilities as a member of the economic</p> <p>11 department of the PLO during the time period you've</p> <p>12 mentioned?</p> <p>13 A. To study and to follow up of the social</p> <p>14 and economic conditions of the Palestinians, and to</p> <p>15 prepare studies. We did prepare studies that were</p> <p>16 published.</p> <p>17 Q. Do you remember the name of any of those</p> <p>18 studies?</p> <p>19 A. Many studies about agriculture, industry,</p> <p>20 tourism, of the conditions at schools, education,</p> <p>21 health -- health care.</p> <p>22 Q. Was the purpose of those studies to</p> <p>23 determine the financial needs of the Palestinian</p> <p>24 people?</p> <p>25 A. The first purpose was to shed light on</p>
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<p>1 Confidential - A. Qurei</p> <p>2 A. I was experienced in economic affairs</p> <p>3 with the organization.</p> <p>4 Q. And at that time, sir, did you have a</p> <p>5 good general understanding of banking, as one would</p> <p>6 expect somebody with 13 years of experience in the</p> <p>7 banking industry to have?</p> <p>8 MR. ROCHON: Objection, vague.</p> <p>9 (Thereupon, the interpreter then</p> <p>10 begins to translate the record into Arabic</p> <p>11 for the witness.)</p> <p>12 THE WITNESS: I -- I cannot judge</p> <p>13 myself.</p> <p>14 My colleagues and those who deal with</p> <p>15 me are in better position to judge me.</p> <p>16 BY MR. STEINER:</p> <p>17 Q. Sir, during that period of time, as a</p> <p>18 member of the economic department for the PLO, were</p> <p>19 you involved in the receipt of funds and the</p> <p>20 distribution of funds for the PLO?</p> <p>21 A. No.</p> <p>22 Q. Who was?</p> <p>23 A. The Palestinian National Fund.</p> <p>24 Q. And what individuals would have knowledge</p> <p>25 about the receipt of and distribution of funds</p>	<p>1 Confidential - A. Qurei</p> <p>2 the conditions of the Palestinian people and to try</p> <p>3 to get them assistance to -- as much as possible.</p> <p>4 Q. And were you giving them assistance</p> <p>5 through an organization known as Samed?</p> <p>6 A. The Samed organization's function was to</p> <p>7 employ people and to create job opportunities.</p> <p>8 Q. You mentioned earlier that over the</p> <p>9 course of the period of time you spent in Lebanon,</p> <p>10 you saw 4,000 to 4,500 Palestinians employed in</p> <p>11 various professions.</p> <p>12 Do you remember saying that?</p> <p>13 A. They were labor.</p> <p>14 Q. And that was under your direction,</p> <p>15 correct?</p> <p>16 A. My direction and the direction of others.</p> <p>17 It was an organization with -- with a big board of</p> <p>18 directors, a big administrative apparatus.</p> <p>19 Q. And by "organization," are you referring</p> <p>20 to Samed?</p> <p>21 A. I mean an organized -- an organized</p> <p>22 institute. Okay. I did not mean by "the</p> <p>23 organization" the PLO, and --</p> <p>24 BY THE INTERPRETER: The interpreter</p> <p>25 wishes to say the word (speaking in</p>

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<p>1 Confidential - A. Qurei</p> <p>2 Arabic) could mean organized or could mean</p> <p>3 organization, and in this context,</p> <p>4 apparently the witness meant organized or</p> <p>5 well organized.</p> <p>6 MR. STEINER: Is that the opinion of</p> <p>7 the check interpreter as well?</p> <p>8 MS. DAIBAS: Yeah.</p> <p>9 BY MR. STEINER:</p> <p>10 Q. Was the employment organized?</p> <p>11 And by "employment" I mean the 4,000 to 4500</p> <p>12 Palestinians engaged in the employment, labor. Was</p> <p>13 the employment organized by the Samed organization?</p> <p>14 A. Every factory had -- had an</p> <p>15 administration and had someone in charge, and most</p> <p>16 of those laborers were involved with vocational</p> <p>17 work.</p> <p>18 Q. Who owned the factories you're</p> <p>19 describing?</p> <p>20 A. It's a nonprofit organization that was</p> <p>21 registered in Lebanon.</p> <p>22 Q. What was the name of that organization?</p> <p>23 A. Samed.</p> <p>24 Q. And did Samed -- what was Samed's</p> <p>25 relationship to the PLO?</p>	<p>1 Confidential - A. Qurei</p> <p>2 A. Yes.</p> <p>3 Q. And you've also been interviewed and</p> <p>4 asked questions over the course of your lifetime</p> <p>5 about Samed, haven't you?</p> <p>6 A. Possibly.</p> <p>7 Q. Sir, I'd like to ask you:</p> <p>8 In 2001, to the best of your knowledge, were</p> <p>9 there still large projects with a few African</p> <p>10 countries that were related to Samed? Did -- let</p> <p>11 me -- withdrawn.</p> <p>12 Did Samed still have large projects with a few</p> <p>13 African countries in 2001?</p> <p>14 A. Yes, there were some projects, but those</p> <p>15 projects were built in the framework of technical</p> <p>16 cooperation, not as investment projects.</p> <p>17 (Thereupon, the interpreter begins to</p> <p>18 confer with the witness in Arabic.)</p> <p>19 THE WITNESS: Now they have been all</p> <p>20 liquidated.</p> <p>21 BY MR. STEINER:</p> <p>22 Q. When did that liquidation occur?</p> <p>23 A. I don't remember. They are all gone.</p> <p>24 They either have confronted problems, like the farm</p> <p>25 in Somalia, and -- and like the farm in Guinea,</p>
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<p>1 Confidential - A. Qurei</p> <p>2 A. It's -- the --</p> <p>3 It's a relation similar to the relation of any</p> <p>4 organization with the mother organization, but it</p> <p>5 had its independence and its own management.</p> <p>6 Q. And did it answer to or report to the PLO</p> <p>7 as its mother organization?</p> <p>8 A. It's like an affiliation.</p> <p>9 Q. Did it receive finances from the PLO?</p> <p>10 And by "it," I mean Samed.</p> <p>11 A. At the beginning, for founding purposes.</p> <p>12 Anyway, there are books, reports and studies about</p> <p>13 Samed. It's not a secret movement.</p> <p>14 Q. Was there a response to whether or not</p> <p>15 Samed received donations of funds from the PLO?</p> <p>16 A. Samed, as a nonprofit organization,</p> <p>17 received funds from the PLO and other organizations</p> <p>18 in the Arab world, and from organizations with</p> <p>19 similar goals. Social and economic goals.</p> <p>20 (Thereupon, a clarification about the</p> <p>21 testimony was made by the court reporter</p> <p>22 with the official interpreter.)</p> <p>23 BY MR. STEINER:</p> <p>24 Q. Sir, you mentioned that there are books</p> <p>25 and many reports written about Samed, correct?</p>	<p>1 Confidential - A. Qurei</p> <p>2 Coveckni (phonetic) and Ginibisau (phonetic).</p> <p>3 Q. When these projects were liquidated,</p> <p>4 where did the funds from the liquidation go?</p> <p>5 (Thereupon, the interpreter begins to</p> <p>6 translate the question into Arabic for the</p> <p>7 witness.)</p> <p>8 THE WITNESS: (Begins speaking in</p> <p>9 Arabic.)</p> <p>10 BY THE INTERPRETER: "There were no</p> <p>11 funds. There were just" --</p> <p>12 (Thereupon, the interpreter begins to</p> <p>13 confer with the witness in Arabic to clarify</p> <p>14 his testimony.</p> <p>15 BY THE INTERPRETER: "They did not</p> <p>16 have assets. They were farms that had</p> <p>17 some agriculture going on which -- which</p> <p>18 dealt with local markets in those poor</p> <p>19 African countries."</p> <p>20 BY MR. STEINER:</p> <p>21 Q. Sir, we discussed some large projects</p> <p>22 that Samed still had in 2001 in Africa.</p> <p>23 Didn't Samed also have assets in Syria at that</p> <p>24 time, in 2001?</p> <p>25 A. There was a cow farm.</p>

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<p>1 Confidential - A. Qurei</p> <p>2 Q. And was that farm ultimately liquidated</p> <p>3 as well?</p> <p>4 A. Pretty much, yes.</p> <p>5 Q. What do you mean by "pretty much," sir?</p> <p>6 A. I mean it's no longer operating.</p> <p>7 Q. What happened?</p> <p>8 A. It had its own independent department</p> <p>9 administration.</p> <p>10 Q. And is that independent administration</p> <p>11 running the farm at this time?</p> <p>12 A. No. I don't know.</p> <p>13 Q. What happened with the assets from the</p> <p>14 liquidation of that farm?</p> <p>15 A. I don't know.</p> <p>16 Q. Does Samed have any assets today?</p> <p>17 A. They were liquidated.</p> <p>18 Q. What happened with the assets from those</p> <p>19 liquidations?</p> <p>20 A. They went to the mother institution.</p> <p>21 Q. What was the mother institution, sir?</p> <p>22 A. The Fatah movement.</p> <p>23 Q. And is it fair to say, then, that it did</p> <p>24 not go to the PLO, but to Fatah?</p> <p>25 A. To Fatah.</p>	<p>1 Confidential - A. Qurei</p> <p>2 social and economic, not investment.</p> <p>3 Q. Social and economic purposes continued</p> <p>4 after the liquidation of Samed, didn't it?</p> <p>5 (Thereupon, the interpreter then</p> <p>6 begins to translate the record into Arabic</p> <p>7 for the witness.)</p> <p>8 MR. ROCHON: Objection, vague.</p> <p>9 (Thereupon, the interpreter then</p> <p>10 continues to translate the record into</p> <p>11 Arabic for the witness.)</p> <p>12 THE WITNESS: Well, there is still</p> <p>13 some work practiced by the government.</p> <p>14 The organization has a government</p> <p>15 now. There is a -- there is an authority</p> <p>16 that was established by virtue of Oslo.</p> <p>17 BY MR. STEINER:</p> <p>18 Q. And any monies which were accumulated</p> <p>19 through the work of the Samed organization would</p> <p>20 still go towards the social and economic development</p> <p>21 of the Palestinian people, regardless of where they</p> <p>22 were, wouldn't it?</p> <p>23 MR. ROCHON: Objection, leading.</p> <p>24 THE WITNESS: Certainly, for the same</p> <p>25 purposes and functions for which it was</p>
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<p>1 Confidential - A. Qurei</p> <p>2 Q. Is the Samed organization still</p> <p>3 registered in Lebanon?</p> <p>4 BY THE INTERPRETER: "Still</p> <p>5 registered in Lebanon"?</p> <p>6 MR. STEINER: That was the question.</p> <p>7 (Thereupon, the interpreter then</p> <p>8 begins to translate the record into Arabic</p> <p>9 for the witness.)</p> <p>10 THE WITNESS: It's still registered,</p> <p>11 but after the division within the movement</p> <p>12 occurred in Lebanon after we left Lebanon,</p> <p>13 they took over all our factories there.</p> <p>14 BY MR. STEINER:</p> <p>15 Q. To the best of your recollection, what</p> <p>16 was the sum of money that resulted from the</p> <p>17 liquidation of Samed and went to Fatah?</p> <p>18 A. I don't remember.</p> <p>19 Q. Approximately how much was it?</p> <p>20 A. I don't know.</p> <p>21 Q. Was it billions of dollars?</p> <p>22 A. (No response).</p> <p>23 Q. Was it millions of dollars?</p> <p>24 A. I don't remember;</p> <p>25 But it was very small, because the purpose was</p>	<p>1 Confidential - A. Qurei</p> <p>2 founded to begin with.</p> <p>3 BY MR. STEINER:</p> <p>4 Q. So when factories and farms are</p> <p>5 liquidated, it's important to track that money and</p> <p>6 make sure it goes on to serve the purpose for which</p> <p>7 it was intended, to help the Palestinian people,</p> <p>8 right?</p> <p>9 (Thereupon, the interpreter then</p> <p>10 begins to translate the record into Arabic</p> <p>11 for the witness.)</p> <p>12 MR. ROCHON: Objection to form.</p> <p>13 BY MR. STEINER:</p> <p>14 Q. So wouldn't it be important, sir, to know</p> <p>15 what that sum of money is?</p> <p>16 A. No.</p> <p>17 Q. Did that money go on to serve the</p> <p>18 Palestinian people after the liquidation?</p> <p>19 A. All our work, all our efforts, all our</p> <p>20 abilities are dedicated to help with the Palestinian</p> <p>21 people.</p> <p>22 MR. STEINER: I received a note from</p> <p>23 the videographer that we have 10 minutes</p> <p>24 left. I received that about a minute and</p> <p>25 a half ago.</p>

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<p>1 Confidential - A. Qurei</p> <p>2 This might be a good time to take a</p> <p>3 break for five minutes or so, if it's all</p> <p>4 right with everybody.</p> <p>5 THE VIDEOGRAPHER: Okay. Off the</p> <p>6 record.</p> <p>7 The time is 11:19. This ends Tape</p> <p>8 No. 1 in the deposition of Ahmed Qurei.</p> <p>9 (Recess taken at 11:19 a.m.)</p> <p>10 (Resumed at 11:29 a.m.)</p> <p>11 THE VIDEOGRAPHER: We're back on the</p> <p>12 record. The time is 11:29.</p> <p>13 This begins Tape No. 2 in the</p> <p>14 deposition of Ahmed Qurei.</p> <p>15 BY MR. STEINER:</p> <p>16 Q. All right. Sir, who is Abdel Muna'em</p> <p>17 Hassan?</p> <p>18 A. I don't remember.</p> <p>19 Q. Is it a name you're aware --</p> <p>20 A. (Speaking in English) I don't know.</p> <p>21 (Thereupon, the interpreter begins to</p> <p>22 speak to the witness in Arabic.)</p> <p>23 BY MR. STEINER:</p> <p>24 Q. Is it a name that you've heard before and</p> <p>25 you just don't know who it is, or it's unknown to</p>	<p>1 Confidential - A. Qurei</p> <p>2 (Thereupon, the interpreter then</p> <p>3 continues to translate the record into</p> <p>4 Arabic for the witness.)</p> <p>5 THE WITNESS: Yes, it is Samed</p> <p>6 Company for Development and Investment.</p> <p>7 It was founded after 1994, in the West</p> <p>8 Bank and Gaza.</p> <p>9 MR. STEINER: Can you read back the</p> <p>10 last part?</p> <p>11 THE REPORTER: Yes.</p> <p>12 (Whereupon, the requested portion of</p> <p>13 the record was read back by the court</p> <p>14 reporter.)</p> <p>15 BY MR. STEINER:</p> <p>16 Q. For what purpose was it founded, sir?</p> <p>17 A. Together everything that Samed -- that</p> <p>18 Samed had and to reinvest it for the -- for the good</p> <p>19 of the Palestinian people in the West Bank and Gaza.</p> <p>20 Q. So who, then, capitalized it, sir?</p> <p>21 THE INTERPRETER: "Who then</p> <p>22 capitalized it?"</p> <p>23 BY MR. STEINER:</p> <p>24 Q. Who capitalized it? Who funded it?</p> <p>25 A. From the assets of Samed abroad.</p>
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<p>1 Confidential - A. Qurei</p> <p>2 you?</p> <p>3 A. I don't remember, and I don't remember</p> <p>4 having heard that name.</p> <p>5 Q. Sir, I'm going to have the interpreter</p> <p>6 read to you an Arabic name of a company registered</p> <p>7 in the Palestinian Authority.</p> <p>8 I am passing the name to the interpreter</p> <p>9 (indicating).</p> <p>10 (Interpreter complies.)</p> <p>11 THE WITNESS: This Samed company --</p> <p>12 it's known. It's well known.</p> <p>13 BY MR. STEINER:</p> <p>14 Q. What is that company?</p> <p>15 A. The Palestinian territory.</p> <p>16 Q. Is a proper translation of that --</p> <p>17 Is it Samed Company for Development and</p> <p>18 Investment?</p> <p>19 THE INTERPRETER: Is that a question</p> <p>20 to the interpreter?</p> <p>21 MR. STEINER: Yeah. No.</p> <p>22 Ask him that, you interpret that best</p> <p>23 you can back into Arabic, and see if he</p> <p>24 agrees. Samed Company for Development and</p> <p>25 Investment.</p>	<p>1 Confidential - A. Qurei</p> <p>2 Q. What was the total of those assets from</p> <p>3 Samed abroad?</p> <p>4 A. I don't remember.</p> <p>5 Q. When you say "Samed abroad," do you mean</p> <p>6 the Samed we discussed earlier that existed in</p> <p>7 Lebanon?</p> <p>8 A. Samed that was founded in Lebanon.</p> <p>9 Q. So is it fair to say that it's a</p> <p>10 substantial amount of money that was transferred</p> <p>11 from that Lebanese Samed to you, the new Samed we</p> <p>12 are discussing, upon the creation of the new Samed</p> <p>13 Company for Development and Investment?</p> <p>14 A. As I said, the majority of Samed's</p> <p>15 workshops and factories were either destroyed in</p> <p>16 Israel, in Lebanon, or taken by the -- the defectors</p> <p>17 within the -- the split movement within the Fatah</p> <p>18 movement, and -- after the invasion, yeah.</p> <p>19 Q. Sir, I'm a little confused, and maybe you</p> <p>20 could clarify it so maybe I can understand it</p> <p>21 better.</p> <p>22 A. If you are confused, don't get me</p> <p>23 confused as well.</p> <p>24 Q. Okay. You probably won't be, but --</p> <p>25 You say the Samed Company for Development and</p>

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<p>1 Confidential - A. Qurei</p> <p>2 Investment was originally funded by the assets from</p> <p>3 the Lebanese Samed company?</p> <p>4 (Thereupon, the interpreter then</p> <p>5 begins to translate the record for the</p> <p>6 witness into Arabic.)</p> <p>7 MS. DAIBAS: (Begins speaking in</p> <p>8 Arabic to the official interpreter.)</p> <p>9 (Thereupon, the interpreter then</p> <p>10 continues to translate the record into</p> <p>11 Arabic for the witness.)</p> <p>12 THE WITNESS: Correct.</p> <p>13 BY MR. STEINER:</p> <p>14 Q. But if I understand correctly, you're</p> <p>15 saying that there were no assets from the Lebanese</p> <p>16 Samed company, because the factories were destroyed</p> <p>17 and such?</p> <p>18 A. That's regarding the assets, but they</p> <p>19 also had some financial -- financial assets that</p> <p>20 were all transferred.</p> <p>21 Q. Okay. What were those assets?</p> <p>22 A. I have a question to ask:</p> <p>23 Are we here to investigate our previous work,</p> <p>24 or to investigate a particular case?</p> <p>25 What I am seeing is that we have been stepping</p>	<p>1 Confidential - A. Qurei</p> <p>2 Q. Was it tens of millions of dollars?</p> <p>3 A. I don't know.</p> <p>4 Q. Was it hundreds of millions of dollars?</p> <p>5 (Thereupon, the interpreter then</p> <p>6 begins to translate the record for the</p> <p>7 witness into Arabic.)</p> <p>8 MR. ROCHON: Objection, asked and</p> <p>9 answered.</p> <p>10 (Thereupon, the interpreter then</p> <p>11 continues to translate the record into</p> <p>12 Arabic for the witness.)</p> <p>13 THE WITNESS: Just to -- just to make</p> <p>14 this short, less than 10. Less than five.</p> <p>15 (Thereupon, an informal discussion was</p> <p>16 held off the record.)</p> <p>17 BY MR. STEINER:</p> <p>18 Q. And by "five," you mean less than five</p> <p>19 million, correct?</p> <p>20 A. I believe so. I don't remember, really.</p> <p>21 I don't remember.</p> <p>22 Q. Was it over three million dollars?</p> <p>23 (Thereupon, the interpreter then</p> <p>24 begins to translate the record into Arabic</p> <p>25 for the witness.)</p>
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<p>1 Confidential - A. Qurei</p> <p>2 out of the subject, and if we -- if we were to go --</p> <p>3 go according to the Israeli rumors, then we are not</p> <p>4 in good shape.</p> <p>5 I am not authorized -- I don't really wish to</p> <p>6 discuss those matters. This is not the case. We</p> <p>7 are here for --</p> <p>8 Q. Sir, a moment ago you said that there</p> <p>9 were finances that belonged to the Lebanese Samed</p> <p>10 that were used to create the new Samed Company for</p> <p>11 Development and Investment.</p> <p>12 A. After -- after we came back here,</p> <p>13 everything that we had abroad, we brought it back to</p> <p>14 the homeland.</p> <p>15 Because we believed that we would be in fact</p> <p>16 able to build peace and create mutually recognized</p> <p>17 states.</p> <p>18 Q. And sir, what was the structure and sum</p> <p>19 of those financial assets that belonged to Samed</p> <p>20 that were used to create the new Samed Company for</p> <p>21 Development and Investment?</p> <p>22 A. I don't know.</p> <p>23 Q. Approximately, what was the total of</p> <p>24 those assets?</p> <p>25 A. I don't know.</p>	<p>1 Confidential - A. Qurei</p> <p>2 MR. ROCHON: Objection.</p> <p>3 THE WITNESS: I don't remember.</p> <p>4 BY MR. STEINER:</p> <p>5 Q. Where were those monies held?</p> <p>6 A. I don't know.</p> <p>7 Q. Were they in the name of a corporation or</p> <p>8 in personal names?</p> <p>9 A. I don't know.</p> <p>10 MR. STEINER: I am going to have this</p> <p>11 document which I've just handed to defense</p> <p>12 counsel marked as Plaintiff's 1, if the</p> <p>13 reporter wouldn't mind.</p> <p>14 (Thereupon, a document was marked by</p> <p>15 the reporter as Plaintiff's Qurei Exhibit 1</p> <p>16 for identification.)</p> <p>17 THE REPORTER: Hand it to the</p> <p>18 witness?</p> <p>19 MR. STEINER: Yes, hand it to the</p> <p>20 witness.</p> <p>21 MR. ROCHON: We object.</p> <p>22 This document has not been introduced</p> <p>23 in discovery.</p> <p>24 (Thereupon, an informal discussion was</p> <p>25 held off the record.)</p>

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<p>1 Confidential - A. Qurei</p> <p>2 MR. ROCHON: Norm, I note you are</p> <p>3 consulting counsel. I will wait until you</p> <p>4 are done.</p> <p>5 MR. STEINER: You can make your</p> <p>6 objection.</p> <p>7 MR. ROCHON: Thank you. We object.</p> <p>8 This document's not been produced in</p> <p>9 discovery in this case.</p> <p>10 Obviously, it would have been</p> <p>11 producible in response to numerous</p> <p>12 requests that have been made for claims.</p> <p>13 MR. STEINER: We've just received it,</p> <p>14 sir, and it's the plaintiff's position</p> <p>15 that this is something --</p> <p>16 We've just received it, sir, and it's</p> <p>17 our position this is something that was in</p> <p>18 the defendant's possession and should have</p> <p>19 been turned over to us pursuant to our</p> <p>20 discovery requests by defendant.</p> <p>21 MR. ROCHON: Do you have a specific</p> <p>22 discovery request you are referencing?</p> <p>23 (Pause)</p> <p>24 MR. ROCHON: As I understand it, this</p> <p>25 is a document that purports to be a Samed</p>	<p>1 Confidential - A. Qurei</p> <p>2 A. I don't see it necessary. No reason to</p> <p>3 do that.</p> <p>4 Q. Okay. Are you refusing to look at it,</p> <p>5 sir?</p> <p>6 (Thereupon, the interpreter then</p> <p>7 begins to translate the record into Arabic</p> <p>8 for the witness.)</p> <p>9 MR. ROCHON: For the record --</p> <p>10 (Thereupon, the interpreter begins to</p> <p>11 confer with the witness in Arabic.)</p> <p>12 THE WITNESS: I'm not saying I'm</p> <p>13 refusing --</p> <p>14 BY MR. STEINER:</p> <p>15 Q. Okay.</p> <p>16 A. -- but it's not necessary.</p> <p>17 Q. So I am asking, please --</p> <p>18 MR. ROCHON: I'll just object.</p> <p>19 The witness had an opportunity to</p> <p>20 look at the document while counsel were</p> <p>21 engaged in discussion. He has seen the</p> <p>22 document.</p> <p>23 BY MR. STEINER:</p> <p>24 Q. Is that fair to say, sir? You've seen</p> <p>25 it?</p>
Page 51	Page 53
<p>1 Confidential - A. Qurei</p> <p>2 registration. There's no request that</p> <p>3 this would have been responsive to.</p> <p>4 (Thereupon, an informal discussion was</p> <p>5 held off the record.)</p> <p>6 MR. STEINER: I don't have the</p> <p>7 request for discovery in front of me and</p> <p>8 cannot cite to a specific request, but</p> <p>9 it's my position --</p> <p>10 MR. ROCHON: Right.</p> <p>11 Since counsel said that it would have</p> <p>12 been producible by -- a response to a</p> <p>13 discovery request, I would think that you</p> <p>14 would have something specific if you are</p> <p>15 going to make allegation as to us in your</p> <p>16 obligation to produce it. Obviously this</p> <p>17 is a document that's part of your defense</p> <p>18 that would have been producible pursuant</p> <p>19 to numerous requests, and in fact,</p> <p>20 pursuant to your obligations under the</p> <p>21 Federal Rules.</p> <p>22 BY MR. STEINER:</p> <p>23 Q. Okay.</p> <p>24 Sir, I am going to ask you to take a look at</p> <p>25 this document (indicating).</p>	<p>1 Confidential - A. Qurei</p> <p>2 A. This is not secret. This is kept by the</p> <p>3 Ministry of the -- and the Ministry of Commerce.</p> <p>4 Why is it here?</p> <p>5 What is the reason for it? I am asking: What</p> <p>6 case are we discussing now? Why are we going all</p> <p>7 different ways?</p> <p>8 Q. Sir, what is that document (indicating)?</p> <p>9 A. This is in connection with the</p> <p>10 institution we have been discussing, which is Samed</p> <p>11 Company for Development and Investment.</p> <p>12 It's an institution under the Palestinian</p> <p>13 Authority. It's -- it's official.</p> <p>14 Q. Is that fair to say that that's the</p> <p>15 certificate of incorporation for that company?</p> <p>16 A. Yes. It is a corporation registration --</p> <p>17 Q. Sir --</p> <p>18 A. -- and it's signed by the Ministry of</p> <p>19 Commerce.</p> <p>20 Q. And does it also contain the names of the</p> <p>21 shareholders of the Samed Company for Development</p> <p>22 and Investment?</p> <p>23 A. This is the board of directors, I believe</p> <p>24 (indicating). This is the board. This is the</p> <p>25 founding -- the founding entity, the founding body.</p>

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<p>1 Confidential - A. Qurei</p> <p>2 Q. What year did these founding members</p> <p>3 found the company?</p> <p>4 A. After '94, and I don't remember.</p> <p>5 Q. Can you please read me the name of the</p> <p>6 first founding member as it's stated on the</p> <p>7 certificate of incorporation?</p> <p>8 (Thereupon, the interpreter begins to</p> <p>9 translate the question into Arabic for the</p> <p>10 witness.)</p> <p>11 THE WITNESS: (Begins speaking in</p> <p>12 Arabic).</p> <p>13 (Thereupon, the interpreter then</p> <p>14 begins to confer with the witness in Arabic</p> <p>15 to clarify his testimony.)</p> <p>16 THE INTERPRETER: "Yes, my name."</p> <p>17 BY MR. STEINER:</p> <p>18 Q. Sir, at that time, what position did you</p> <p>19 hold with the Palestinian Authority or the PLO? And</p> <p>20 "by that time," I mean the time that this company</p> <p>21 was incorporated.</p> <p>22 A. I don't -- I don't remember.</p> <p>23 Q. Did you indeed hold a position with the</p> <p>24 Palestinian Authority or the PLO in 1994?</p> <p>25 A. I don't remember.</p>	<p>1 Confidential - A. Qurei</p> <p>2 in 1994 independently?</p> <p>3 A. My whole life and our whole life have</p> <p>4 been dedicated to helping the Palestinian people.</p> <p>5 Q. And were you doing that as part of a</p> <p>6 larger organization for your whole life?</p> <p>7 A. What do you mean?</p> <p>8 Q. Were you doing it as part of Fatah, as</p> <p>9 part of the PLO, and/or as part of the Palestinian</p> <p>10 Authority --</p> <p>11 (Thereupon, the interpreter then</p> <p>12 begins to translate the record into Arabic</p> <p>13 for the witness.)</p> <p>14 BY MR. STEINER:</p> <p>15 Q. -- or other organizations that I haven't</p> <p>16 mentioned?</p> <p>17 (Thereupon, the interpreter continues</p> <p>18 to translate the record into Arabic to the</p> <p>19 witness.)</p> <p>20 THE INTERPRETER: What was the last</p> <p>21 part?</p> <p>22 MR. STEINER: "Or other</p> <p>23 organizations, which I haven't mentioned."</p> <p>24 (Thereupon, the interpreter then</p> <p>25 continues to translate the record into</p>
Page 55	Page 57
<p>1 Confidential - A. Qurei</p> <p>2 Q. Were you still engaged in the social</p> <p>3 commission advancement of the Palestinian people in</p> <p>4 1994?</p> <p>5 A. I spoke already. I don't remember.</p> <p>6 Q. And were you doing it as a freelance</p> <p>7 agent, or were you part of a group?</p> <p>8 (Thereupon, the interpreter then</p> <p>9 begins to translate the record into Arabic</p> <p>10 for the witness.)</p> <p>11 MR. ROCHON: Objection to the form.</p> <p>12 (Thereupon, the interpreter continues</p> <p>13 to translate the record into Arabic to the</p> <p>14 witness.)</p> <p>15 BY MR. STEINER:</p> <p>16 Q. Were you doing it independently, or were</p> <p>17 you part of a group?</p> <p>18 (Thereupon, the interpreter then</p> <p>19 begins to translate the record into Arabic</p> <p>20 for the witness.)</p> <p>21 MR. ROCHON: Objection to form.</p> <p>22 THE WITNESS: The Palestinian</p> <p>23 politics cannot be discussed here.</p> <p>24 BY MR. STEINER:</p> <p>25 Q. Were you helping the Palestinian people</p>	<p>1 Confidential - A. Qurei</p> <p>2 Arabic for the witness.)</p> <p>3 THE WITNESS: No. The Palest -- the</p> <p>4 official organizations for some of them or</p> <p>5 all of them.</p> <p>6 BY MR. STEINER:</p> <p>7 Q. And in 1994, that was also true, wasn't</p> <p>8 it? You were doing it under an official</p> <p>9 organization?</p> <p>10 A. When?</p> <p>11 Q. 1994, the period that we've been</p> <p>12 discussing, when this company was incorporated as</p> <p>13 reflected in Qurei Exhibit 1.</p> <p>14 (Thereupon, the interpreter then</p> <p>15 begins to translate the record into Arabic</p> <p>16 for the witness.)</p> <p>17 THE WITNESS: We had returned to the</p> <p>18 homeland at that point.</p> <p>19 BY MR. STEINER:</p> <p>20 Q. And at that point when you returned to</p> <p>21 what you described as the "homeland," what was your</p> <p>22 position? What are you referring to as the</p> <p>23 "homeland"?</p> <p>24 A. It is the homeland. It looks like you</p> <p>25 are shedding doubt on that. It is the homeland.</p>

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<p>1 Confidential - A. Qurei</p> <p>2 Q. I'm also not here to discuss the politics</p> <p>3 with you, sir.</p> <p>4 A. This is my homeland.</p> <p>5 Q. Okay. When you returned to your</p> <p>6 homeland, sir --</p> <p>7 A. Yeah.</p> <p>8 Q. -- in 1994, what position were you -- did</p> <p>9 you hold?</p> <p>10 A. There is no reason to discuss all that.</p> <p>11 I already spoke about all this. I said that I was</p> <p>12 leading the Oslo negotiations.</p> <p>13 Then I led the transitional negotiations, and I</p> <p>14 kept on leading the negotiations until 2008 with</p> <p>15 Israel, not with anyone else.</p> <p>16 Q. And you had a title when you were engaged</p> <p>17 in that activity, didn't you?</p> <p>18 A. Not necessarily. This is our business.</p> <p>19 Q. Sir, the certificate which is before you</p> <p>20 as Exhibit 1 actually states that the corporation</p> <p>21 was formed in June of 1995, doesn't it?</p> <p>22 A. That's what it says (indicating). It's a</p> <p>23 document in front of you. Will I be more accurate</p> <p>24 than the document?</p> <p>25 Q. You've already told us, sir, that your</p>	<p>1 Confidential - A. Qurei</p> <p>2 of your belief that it's not appropriate?</p> <p>3 A. I am asking you not to put words in my</p> <p>4 mouth.</p> <p>5 Q. Sir, I'm asking you to use your own</p> <p>6 words, then. Why aren't you answering the question,</p> <p>7 then?</p> <p>8 A. You have a document, and you are looking</p> <p>9 at it, and you're telling me this is the document</p> <p>10 (indicating).</p> <p>11 Q. And the only thing I'm trying to</p> <p>12 ascertain --</p> <p>13 A. And I already listed for you the tasks</p> <p>14 that I handled.</p> <p>15 Q. The only thing I'm trying to ascertain at</p> <p>16 this time, before I move on, is what position you</p> <p>17 held for Fatah, the Palestinian Authority, or the</p> <p>18 PLO or any other organization in 1995, when your</p> <p>19 name appeared as the first member of the</p> <p>20 corporation.</p> <p>21 (Thereupon, the interpreter begins to</p> <p>22 translate the question into Arabic for the</p> <p>23 witness.)</p> <p>24 THE INTERPRETER: The interpreter is</p> <p>25 not getting to finish the interpretation,</p>
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<p>1 Confidential - A. Qurei</p> <p>2 life and the positions you've held and the</p> <p>3 accomplishments you've attained has been documented</p> <p>4 in textbooks, correct?</p> <p>5 (Thereupon, the interpreter then</p> <p>6 begins to translate the record into Arabic</p> <p>7 for the witness.)</p> <p>8 MR. ROCHON: Asked and answered.</p> <p>9 (Thereupon, the interpreter continues</p> <p>10 to translate the record into Arabic to the</p> <p>11 witness.)</p> <p>12 THE WITNESS: Correct.</p> <p>13 BY MR. STEINER:</p> <p>14 Q. And are you telling me, sir, that while</p> <p>15 textbooks describe the positions you've held over</p> <p>16 the course of your lifetime, you as you sit here</p> <p>17 today do not remember what position you held in</p> <p>18 1995?</p> <p>19 A. Go back to the textbooks and to the</p> <p>20 documents. I believe that the subject is different.</p> <p>21 This is not the subject. This is not the subject.</p> <p>22 Q. And are you refusing to answer this --</p> <p>23 A. Are we Palestinian citizens being put in</p> <p>24 such position?</p> <p>25 Q. Are you refusing to answer, then, because</p>	<p>1 Confidential - A. Qurei</p> <p>2 with all due respect to Mr. Qurei, will</p> <p>3 your counsel ask him to give me an</p> <p>4 opportunity to interpret before he</p> <p>5 answers?</p> <p>6 MR. ROCHON: If you could, wait until</p> <p>7 he finishes before you answer.</p> <p>8 (Thereupon, the interpreter continues</p> <p>9 to translate the record into Arabic to the</p> <p>10 witness.)</p> <p>11 MR. STEINER: Do you need to take a</p> <p>12 short break, sir?</p> <p>13 THE WITNESS: No. I am excellent.</p> <p>14 MR. STEINER: Okay. Thank you.</p> <p>15 BY MR. STEINER:</p> <p>16 Q. Could we have the answer, please?</p> <p>17 MR. ROCHON: If the question could be</p> <p>18 asked in a noncompound way?</p> <p>19 You are putting a lot of facts in</p> <p>20 your question.</p> <p>21 MR. STEINER: Very well, sir.</p> <p>22 BY MR. STEINER:</p> <p>23 Q. Sir, my question is:</p> <p>24 What position did you hold in 1995 when you</p> <p>25 were listed as the first shareholder of the</p>

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<p>1 Confidential - A. Qurei</p> <p>2 corporation which is depicted on Plaintiff's</p> <p>3 Exhibit 1?</p> <p>4 A. I am at the PLO and a member thereof. I</p> <p>5 am at Fatah and a member thereof. I am at the</p> <p>6 Palestinian National Authority and a member thereof,</p> <p>7 and I am in charge of negotiations with Israel.</p> <p>8 Q. And as a member of the organizations that</p> <p>9 you just mentioned, and as a negotiator with Israel,</p> <p>10 as you just mentioned, did you hold a title in any</p> <p>11 of those organizations in 1995?</p> <p>12 (Thereupon, the interpreter begins to</p> <p>13 translate the question into Arabic for the</p> <p>14 witness.)</p> <p>15 THE WITNESS: (Begins speaking in</p> <p>16 Arabic.)</p> <p>17 THE INTERPRETER: "Of course. At all</p> <p>18 stages there are responsibilities that are</p> <p>19 distributed."</p> <p>20 (Thereupon, the interpreter begins to</p> <p>21 confer with the witness in Arabic to clarify</p> <p>22 his testimony.)</p> <p>23 THE INTERPRETER: "I'm not -- I -- I</p> <p>24 was someone in charge. I was not someone</p> <p>25 out of -- I was not jobless."</p>	<p>1 Confidential - A. Qurei</p> <p>2 BY MR. STEINER:</p> <p>3 Q. And those organizations had a structure,</p> <p>4 didn't they?</p> <p>5 A. Certainly. Every organization, every</p> <p>6 institution has a structure.</p> <p>7 Q. And in 1995, the PLO had a structure as</p> <p>8 well, didn't it?</p> <p>9 A. Certainly, of course.</p> <p>10 Q. And that structure ranged from the</p> <p>11 highest member of the organization, whatever title</p> <p>12 that might be, to the lowest member of the</p> <p>13 organization, whatever title that might be, correct?</p> <p>14 A. Yes, of course. Possibly.</p> <p>15 Q. And what was your title?</p> <p>16 MR. ROCHON: Wait. He --</p> <p>17 MR. STEINER: I'm sorry.</p> <p>18 MR. ROCHON: I don't know if the</p> <p>19 interpreter --</p> <p>20 (Thereupon, an informal discussion was</p> <p>21 held off the record.)</p> <p>22 THE INTERPRETER: "Possibly."</p> <p>23 BY MR. STEINER:</p> <p>24 Q. So, then, sir, what was your title in</p> <p>25 1995?</p>
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<p>1 Confidential - A. Qurei</p> <p>2 BY MR. STEINER:</p> <p>3 Q. I appreciate that, sir. Thank you. What</p> <p>4 was that job title?</p> <p>5 A. What do you want?</p> <p>6 Q. The job title.</p> <p>7 A. I was a member of the Palestinian</p> <p>8 Organization -- Palestinian Liberation Organization</p> <p>9 into the entire -- in front of the whole world.</p> <p>10 I was a member of the Fatah movement in front</p> <p>11 of the whole world. I was a member of the</p> <p>12 Palestinian National Authority, and one of the</p> <p>13 founders in front of the whole world.</p> <p>14 Q. In addition to being a member, you were</p> <p>15 an important member of those organizations, weren't</p> <p>16 you?</p> <p>17 THE INTERPRETER: "You were" -- what?</p> <p>18 MR. STEINER: "An important member of</p> <p>19 those organizations, weren't you?"</p> <p>20 (Thereupon, the interpreter then</p> <p>21 begins to translate the record into Arabic</p> <p>22 for the witness.)</p> <p>23 THE WITNESS: I have always been</p> <p>24 important. I've always been important.</p> <p>25 Leave humbleness alone.</p>	<p>1 Confidential - A. Qurei</p> <p>2 (Thereupon, the interpreter then</p> <p>3 begins to translate the record into Arabic</p> <p>4 for the witness.)</p> <p>5 MR. ROCHON: Objection, relevance.</p> <p>6 (Thereupon, the interpreter continues</p> <p>7 to translate the record into Arabic to the</p> <p>8 witness.)</p> <p>9 THE WITNESS: Like I said, I was in a</p> <p>10 position of responsibility in economic and</p> <p>11 social affairs.</p> <p>12 And when we came back within the</p> <p>13 Palestinian Authority, I also had an</p> <p>14 important position. I was in charge of</p> <p>15 Bekdar.</p> <p>16 MR. STEINER: In charge of what?</p> <p>17 THE INTERPRETER: Bekdar,</p> <p>18 B-E-K-D-A-R.</p> <p>19 (Thereupon, an informal discussion was</p> <p>20 held off the record.)</p> <p>21 MR. ROCHON: Let's get the answer</p> <p>22 clear. Objection.</p> <p>23 THE INTERPRETER: This interpreter is</p> <p>24 not Palestinian. He doesn't know much</p> <p>25 about the Palestinian Organization.</p>

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<p>1 Confidential - A. Qurei</p> <p>2 MR. ROCHON: Right.</p> <p>3 I will offer a stipulation to what</p> <p>4 the witness said, because we are familiar</p> <p>5 with the term. PEC DAR, P-E-D-C-A-R.</p> <p>6 THE REPORTER: Thank you.</p> <p>7 THE WITNESS: (Speaking in English)</p> <p>8 Palestinian Economy Development</p> <p>9 Organization or something.</p> <p>10 BY MR. STEINER:</p> <p>11 Q. Sir, on that document (indicating), which</p> <p>12 I would ask be put back in front of you,</p> <p>13 Exhibit 1 --</p> <p>14 Yours is the first name, as we've already</p> <p>15 agreed, correct?</p> <p>16 A. Yes.</p> <p>17 Q. Why was it decided that you would be</p> <p>18 first?</p> <p>19 (Thereupon, the interpreter begins to</p> <p>20 translate the question into Arabic for the</p> <p>21 witness.)</p> <p>22 MR. ROCHON: Objection, calls for</p> <p>23 speculation.</p> <p>24 BY MR. STEINER:</p> <p>25 Q. If you know.</p>	<p>1 Confidential - A. Qurei</p> <p>2 THE INTERPRETER: In English,</p> <p>3 "Because I am nice."</p> <p>4 THE WITNESS: (Speaking in English)</p> <p>5 I am good.</p> <p>6 BY MR. STEINER:</p> <p>7 Q. And by "nice" and "good" --</p> <p>8 "Nice" I know, but good at what? You're</p> <p>9 good --</p> <p>10 A. (Speaking in English) I am in this</p> <p>11 field.</p> <p>12 THE INTERPRETER: "I am in this</p> <p>13 field."</p> <p>14 THE WITNESS: (Begins speaking in</p> <p>15 Arabic.)</p> <p>16 MR. STEINER: Okay.</p> <p>17 MR. ROCHON: Was that the last he</p> <p>18 said?</p> <p>19 THE INTERPRETER: What he said in</p> <p>20 Arabic was a translation of what he said</p> <p>21 in English.</p> <p>22 MR. ROCHON: Thank you.</p> <p>23 BY MR. STEINER:</p> <p>24 Q. And was the head of the board of</p> <p>25 directors an appointed position, or a position</p>
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<p>1 Confidential - A. Qurei</p> <p>2 THE INTERPRETER: Why was it --</p> <p>3 BY MR. STEINER:</p> <p>4 Q. If you know, why was it decided that you</p> <p>5 would be first?</p> <p>6 A. Ask those who decided.</p> <p>7 (Brief clarification by the court</p> <p>8 reporter.)</p> <p>9 BY MR. STEINER:</p> <p>10 Q. There's a column to the left of that page</p> <p>11 alongside your name, isn't there?</p> <p>12 MR. STEINER: And I'll indicate to</p> <p>13 the witness visually what I mean</p> <p>14 (indicating).</p> <p>15 (Thereupon, the interpreter begins to</p> <p>16 translate the question into Arabic for the</p> <p>17 witness.)</p> <p>18 THE WITNESS: Yes.</p> <p>19 BY MR. STEINER:</p> <p>20 Q. And there it lists your title as head of</p> <p>21 the board of directors, doesn't it?</p> <p>22 A. Yes, yes.</p> <p>23 Q. And do you know why you were chosen to be</p> <p>24 head of the board of directors?</p> <p>25 A. (Speaking in English) Because I am nice.</p>	<p>1 Confidential - A. Qurei</p> <p>2 decided by some sort of vote?</p> <p>3 A. By agreement.</p> <p>4 Q. Who agreed?</p> <p>5 A. Those members and high-level -- higher</p> <p>6 level entities.</p> <p>7 Is this the case that we are discussing here?</p> <p>8 I have no problem with that. I will stay with you</p> <p>9 until tomorrow, but this is the subject?</p> <p>10 Q. Sir, who are the higher authorities that</p> <p>11 you just mentioned?</p> <p>12 A. The authorities like the head of the --</p> <p>13 the head of the organization and the head of the</p> <p>14 Authority.</p> <p>15 Q. And who was the head of the organization</p> <p>16 at that time?</p> <p>17 A. The head of the organization? Isn't he</p> <p>18 known enough?</p> <p>19 Q. Which organization are we talking about?</p> <p>20 MS. DAIBAS: (Begins speaking in</p> <p>21 Arabic.)</p> <p>22 THE WITNESS: The Palestinian</p> <p>23 Liberation Organization.</p> <p>24 BY MR. STEINER:</p> <p>25 Q. I'm sorry, sir.</p>

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<p>1 Confidential - A. Qurei</p> <p>2 I didn't know that was the organization you are</p> <p>3 referring to.</p> <p>4 A. The head is the head of the Palestinian</p> <p>5 Authority, Yasser Arafat.</p> <p>6 Q. So, sir, is it fair to say that it was</p> <p>7 Yasser Arafat that appointed you to be the head of</p> <p>8 the board of directors?</p> <p>9 A. Certainly. I couldn't have been without</p> <p>10 that.</p> <p>11 MR. ROCHON: Norm, we are going to</p> <p>12 interpose, if you like, a standing</p> <p>13 relevance objection to Samed. I don't</p> <p>14 want to do an objection after each of</p> <p>15 these questions.</p> <p>16 You've been going for a quite a while</p> <p>17 on Samed, if it's okay with you, I will</p> <p>18 object on relevance ground and not object</p> <p>19 on each question as you go on with Samed</p> <p>20 in the '90s.</p> <p>21 (Thereupon, an informal discussion was</p> <p>22 held off the record.)</p> <p>23 BY MR. STEINER:</p> <p>24 Q. Sir, what's the second name right beneath</p> <p>25 yours (indicating)?</p>	<p>1 Confidential - A. Qurei</p> <p>2 speaks for itself. If you like, you can</p> <p>3 have your interpreter read you the names.</p> <p>4 Asking the witness to read a document</p> <p>5 aloud to you is not really what the former</p> <p>6 prime minister came to the deposition to</p> <p>7 do today.</p> <p>8 If you want to read the name to him</p> <p>9 and ask about a person, fine, but he's not</p> <p>10 here to read for you.</p> <p>11 MR. STEINER: Mr. Interpreter, could</p> <p>12 you read me the name of the second person</p> <p>13 on the document?</p> <p>14 THE INTERPRETER: Sure. The second</p> <p>15 name is Engineer Fadel Saed Mohammed</p> <p>16 Kaawash.</p> <p>17 (Thereupon, an informal discussion was</p> <p>18 held off the record between the court</p> <p>19 reporter and the official interpreter.)</p> <p>20 BY MR. STEINER:</p> <p>21 Q. Sir, do you know that person?</p> <p>22 A. Of course. I know them all.</p> <p>23 Q. And what position does that individual</p> <p>24 hold with the Palestinian Authority or the PLO?</p> <p>25 (Thereupon, the interpreter then</p>
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<p>1 Confidential - A. Qurei</p> <p>2 A. I am not ready to discuss names.</p> <p>3 Q. Will you tell me what the third or any of</p> <p>4 the other names are on that document?</p> <p>5 A. (Speaking in English) Not any name.</p> <p>6 (Begins speaking in Arabic).</p> <p>7 THE INTERPRETER: In English, "Not</p> <p>8 any name."</p> <p>9 In Arabic, "Not any name."</p> <p>10 BY MR. STEINER:</p> <p>11 Q. And I'm not trying to put words in your</p> <p>12 mouth, sir, but is it fair to say that by not being</p> <p>13 ready to discuss these names that you are refusing</p> <p>14 to answer?</p> <p>15 (Thereupon, the interpreter then</p> <p>16 begins to translate the record into Arabic</p> <p>17 for the witness.)</p> <p>18 MR. ROCHON: Let me just --</p> <p>19 THE WITNESS: (Begins speaking in</p> <p>20 Arabic.)</p> <p>21 MR. STEINER: Can we get a</p> <p>22 translation of what the witness said?</p> <p>23 THE INTERPRETER: "I'm not ready to</p> <p>24 discuss names."</p> <p>25 MR. ROCHON: Objection. The document</p>	<p>1 Confidential - A. Qurei</p> <p>2 begins to translate the record into Arabic</p> <p>3 for the witness.)</p> <p>4 MR. ROCHON: I am going to object.</p> <p>5 Are you asking him what this person's</p> <p>6 position was in 1995?</p> <p>7 MR. STEINER: Today.</p> <p>8 MR. ROCHON: Well, that wasn't in</p> <p>9 your question.</p> <p>10 MR. STEINER: I thought I said "does</p> <p>11 this person hold."</p> <p>12 (Thereupon, the interpreter then</p> <p>13 begins to translate the record into Arabic</p> <p>14 for the witness.)</p> <p>15 THE WITNESS: (No response).</p> <p>16 MR. STEINER: Let the record indicate</p> <p>17 the witness has raised his right hand and</p> <p>18 looked upward.</p> <p>19 THE WITNESS: They're all involved in</p> <p>20 the Palestinian National Authority.</p> <p>21 BY MR. STEINER:</p> <p>22 Q. What position do the individuals</p> <p>23 listed --</p> <p>24 A. (Answering in Arabic before the question</p> <p>25 is translated) It's none of my business.</p>

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<p>1 Confidential - A. Qurei</p> <p>2 MR. STEINER: I would ask the</p> <p>3 interpreter to read the name of the third</p> <p>4 person.</p> <p>5 THE INTERPRETER: Okay.</p> <p>6 Engineer Abdul Aziz Abdul Rahman</p> <p>7 Alaraj.</p> <p>8 (Thereupon, an informal discussion was</p> <p>9 held off the record between the court</p> <p>10 reporter and the official interpreter.)</p> <p>11 BY MR. STEINER:</p> <p>12 Q. What position does that individual hold</p> <p>13 in the PLO or the Palestinian Authority at this</p> <p>14 time?</p> <p>15 A. (Speaking in English before the question</p> <p>16 is translated) I don't know.</p> <p>17 Q. What position did that individual hold in</p> <p>18 1995?</p> <p>19 A. (Speaking in English) I don't know.</p> <p>20 Q. Sir, nine names remain beneath the</p> <p>21 individual just mentioned to you.</p> <p>22 A. "I don't know" goes for all of them.</p> <p>23 Q. My question was going to be:</p> <p>24 Is it safe to assume that if I continued to ask</p> <p>25 you what positions these individuals hold today at</p>	<p>1 Confidential - A. Qurei</p> <p>2 A. What do you mean?</p> <p>3 Q. We agreed earlier that the PLO and the PA</p> <p>4 are structured by different job titles ranging from</p> <p>5 the top official to the lowest official.</p> <p>6 A. So what?</p> <p>7 Q. My question now is: As prime minister,</p> <p>8 you're aware --</p> <p>9 You would be aware of at least the important</p> <p>10 job titles which were within the hierarchy of the</p> <p>11 structure of the PLO, weren't you?</p> <p>12 A. I became a prime minister in 2003.</p> <p>13 Q. And you are saying, sir, that when you</p> <p>14 look down at these names (indicating) before you,</p> <p>15 you do not know any of the job titles of any of</p> <p>16 these individuals today? What they are today?</p> <p>17 A. I don't know.</p> <p>18 Q. Do you know any positions that any of</p> <p>19 these individuals held while you were prime</p> <p>20 minister?</p> <p>21 A. I don't know.</p> <p>22 Q. And do you know any positions that any of</p> <p>23 these individuals held when the company was</p> <p>24 incorporated in 1995?</p> <p>25 A. I don't know.</p>
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<p>1 Confidential - A. Qurei</p> <p>2 the Palestinian Authority, your answer would be the</p> <p>3 same?</p> <p>4 A. I don't know.</p> <p>5 Q. Sir, do you not know what positions these</p> <p>6 people hold, or is it that you do not want to</p> <p>7 discuss what positions these people hold?</p> <p>8 A. I don't know.</p> <p>9 Q. Sir, you were for a time the prime</p> <p>10 minister of the PLO, weren't you?</p> <p>11 A. Yes.</p> <p>12 Q. And as prime --</p> <p>13 And as prime minister, you were aware of most</p> <p>14 of the goings on related to the organization,</p> <p>15 weren't you?</p> <p>16 THE INTERPRETER: "As prime minister</p> <p>17 you were" --</p> <p>18 BY MR. STEINER:</p> <p>19 Q. You were aware of most of the goings on</p> <p>20 related to the organization, weren't you? Most of</p> <p>21 the activities?</p> <p>22 A. Possibly.</p> <p>23 Q. And you were aware of the structural</p> <p>24 hierarchy and different positions which were in</p> <p>25 place in the PLO, weren't you?</p>	<p>1 Confidential - A. Qurei</p> <p>2 Q. Who appointed these individuals, sir?</p> <p>3 A. I don't know.</p> <p>4 Q. Would it be the same individual who</p> <p>5 appointed you, Mr. Yasser Arafat?</p> <p>6 A. Possibly. I don't know.</p> <p>7 Q. Sir, it's fair to say that this</p> <p>8 organization existed for the betterment of the</p> <p>9 Palestinian people, didn't it?</p> <p>10 A. Supposedly.</p> <p>11 Q. Well, do you have any knowledge of any</p> <p>12 activities that this corporation which was --</p> <p>13 withdrawn.</p> <p>14 Do you have any knowledge of any activities</p> <p>15 that this corporation was engaged in, which was not</p> <p>16 for the betterment of the Palestinian people?</p> <p>17 And the only reason why I'm asking, because</p> <p>18 your answer was "supposedly."</p> <p>19 A. Activities not in the favor of the</p> <p>20 Palestinian people?</p> <p>21 Q. That's right.</p> <p>22 The only reason why I'm asking is because your</p> <p>23 response was "Supposedly."</p> <p>24 A. Supposedly what?</p> <p>25 Q. When I asked you if this organization</p>

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<p>1 Confidential - A. Qurei</p> <p>2 existed for the betterment of the Palestinian</p> <p>3 people, your response was "Supposedly."</p> <p>4 A. I said "It is supposed to," meaning "of</p> <p>5 course."</p> <p>6 MR. STEINER: Does the check</p> <p>7 interpreter agree?</p> <p>8 MS. DAIBAS: Yes.</p> <p>9 MR. STEINER: Okay.</p> <p>10 BY MR. STEINER:</p> <p>11 Q. So, sir, the betterment of the</p> <p>12 Palestinian people, as you've stated previously, was</p> <p>13 the cause and concern of your entire life, correct?</p> <p>14 A. Of course.</p> <p>15 Q. So when an organization -- when a</p> <p>16 corporation's created to better the lives of</p> <p>17 Palestinians, it's done in a structured format,</p> <p>18 isn't it? There's a lot at stake?</p> <p>19 (Thereupon, the interpreter begins to</p> <p>20 translate the question into Arabic for the</p> <p>21 witness.)</p> <p>22 THE WITNESS: (Begins speaking in</p> <p>23 Arabic.)</p> <p>24 (Thereupon, the interpreter then</p> <p>25 begins to confer with the witness in Arabic</p>	<p>1 Confidential - A. Qurei</p> <p>2 begins to translate the record into Arabic</p> <p>3 for the witness.)</p> <p>4 MR. ROCHON: I'm going to object.</p> <p>5 I'm going to ask the witness step out, so</p> <p>6 you don't think a speaking objection by me</p> <p>7 is directing or suggesting anything to the</p> <p>8 witness.</p> <p>9 MR. STEINER: I will ask --</p> <p>10 MR. ROCHON: I'll even take it on my</p> <p>11 time, if you want.</p> <p>12 MR. STEINER: I don't mind the</p> <p>13 witness stepping out after he gives a</p> <p>14 response to the question.</p> <p>15 MR. ROCHON: Okay. So the question</p> <p>16 was -- you are saying?</p> <p>17 BY MR. STEINER:</p> <p>18 Q. In a corporation such as this --</p> <p>19 MR. ROCHON: Wait. Let's just be</p> <p>20 clear. You are withdrawing the last</p> <p>21 question?</p> <p>22 MR. STEINER: Clarifying the last</p> <p>23 question.</p> <p>24 BY MR. STEINER:</p> <p>25 Q. All right.</p>
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<p>1 Confidential - A. Qurei</p> <p>2 to clarify his testimony.)</p> <p>3 THE INTERPRETER: "The ultimate goal</p> <p>4 of -- of every work we engaged in was the</p> <p>5 good of the Palestinian people."</p> <p>6 BY MR. STEINER:</p> <p>7 Q. So shareholders and members of an</p> <p>8 important corporation are not chosen randomly, are</p> <p>9 they?</p> <p>10 (Thereupon, the interpreter then</p> <p>11 begins to translate the record into Arabic</p> <p>12 for the witness.)</p> <p>13 MR. ROCHON: Objection.</p> <p>14 (Thereupon, the interpreter continues</p> <p>15 to translate the record into Arabic to the</p> <p>16 witness.)</p> <p>17 MR. ROCHON: It's mischaracterizing</p> <p>18 the previous testimony.</p> <p>19 The witness said he didn't know. The</p> <p>20 witness simply said he didn't know how</p> <p>21 they chose. He did not say that it was</p> <p>22 random.</p> <p>23 BY MR. STEINER:</p> <p>24 Q. I am asking if it was selected randomly.</p> <p>25 (Thereupon, the interpreter then</p>	<p>1 Confidential - A. Qurei</p> <p>2 In a corporation such as this one, whose sole</p> <p>3 purpose is to better the lives of the Palestinian</p> <p>4 people, who oversees large funds, are its</p> <p>5 shareholders randomly selected?</p> <p>6 A. I believe this is out of the subject</p> <p>7 matter. Completely out of the subject. This has</p> <p>8 nothing to do with what I thought would be the</p> <p>9 subject.</p> <p>10 Q. And sir, if I could just ask --</p> <p>11 MR. ROCHON: Wait.</p> <p>12 You said you would take a break after</p> <p>13 he you got an answer, so if Mr. -- I would</p> <p>14 have the witness step out.</p> <p>15 THE VIDEOGRAPHER: Off the record.</p> <p>16 MR. ROCHON: I wanted to be on the</p> <p>17 record. I just want the witness to step</p> <p>18 out, because I don't want my objection,</p> <p>19 which needs to be on the record -- to have</p> <p>20 you guys argue to say I am suggesting</p> <p>21 something to the witness, which is what</p> <p>22 you always say when I object.</p> <p>23 MR. STEINER: Thank you. We'll have</p> <p>24 him step out.</p> <p>25 MR. ROCHON: I will ask the witness</p>